



Emma Gilmore  
Partner

February 25, 2021

**BY ECF**

The Honorable Michael A. Hammer  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: ***Karimi v. Deutsche Bank Aktiengesellschaft, et al.***,  
**Case No. 20-CV-08978-ES-MAH**

Dear Judge Hammer:

We represent Plaintiff Ali Karimi and write on behalf of all parties in the above-referenced action (the “Action”). In accordance with the Court’s Order entered December 9, 2020 (Dkt. No. 29), the parties provide this joint updated status report regarding the status of the Action.

The Action is a putative securities class action, alleging violations of the federal securities laws by the Defendants on behalf of a class consisting of all persons or entities who acquired the securities of Deutsche Bank Aktiengesellschaft between November 7, 2017 and July 6, 2020, both dates inclusive (the “Class”). The Action is governed by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4 *et seq.* (the “PSLRA”), including provisions directing the appointment of a Lead Plaintiff and staying discovery. Pursuant to the PSLRA, any member of the putative Class wishing to seek appointment as Lead Plaintiff in the Action was required to so move the Court on or before September 14, 2020. Two movants filed motions on the statutory deadline: (1) Yun Wang (“Wang”) (Dkt. No. 18); and (2) Srialahasti Vagvala (“Vagvala”) (Dkt. No. 17). On September 23, 2020, Vagvala filed a notice of withdrawal of his motion. Dkt. No. 19. On December 28, 2020, Judge Kevin McNulty granted Wang’s uncontested motion as Lead Plaintiff (“Lead Plaintiff”) and his attorneys, Pomerantz LLP, as Lead Counsel in the above-referenced Action (Dkt. No. 31).

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On December 31, 2020, the parties jointly submitted a stipulation for extension of the filing of the Second Amended Complaint and Motion to Dismiss Briefing Schedule. On January 4, 2021, Judge McNulty entered an Order (Dkt. No. 32) providing, in relevant part, that: (1) Lead Plaintiff's Second Amended Complaint shall be filed March 1, 2021; (2) Defendants' deadline to answer, plead, move, or otherwise respond to the Second Amended Complaint shall be April 15, 2021; (3) Lead Plaintiff's opposition to the motion to dismiss shall be filed June 1, 2021; and (4) Defendants' reply thereto shall be filed July 1, 2021.

Respectfully submitted,

s/ Emma Gilmore  
Emma Gilmore

cc: All Counsel (by ECF)